Miner

COSDEN OIL & CHEMICAL COMPANY

P. O. BOX 1311
BIG SPRING, TEXAS 79720
TELEPHONE (915) 263-7661

November 30, 1982

Mr. Karl J. Klepitsch, Jr., Chief
Waste Management Branch
U.S. Environmental Protection Agency
Region V
111 West Jackson Blvd.
Chicago, Illinois 60604

Dear Mr. Klepitsch:

Subject: Cosden Oil & Chemical Company, 142nd Street & Paxton Ave.
Calumet City, Illinois 60409 ILD091766410 G, TSD, PA, I

The purpose of this letter is to amend the information submitted in Cosden Oil & Chemical Company's, Part A Application (Forms 3510-1 and 3510-3) to effect withdrawal of that application in lieu of submitting the Part B Application. This letter will also confirm my conversation with Mr. Hak Cho of your staff on October 7, 1982 concerning this subject.

On November 18, 1980, Cosden Oil & Chemical Company filed a Part A Application based on our interpretation of the interim status requirements of the May 19, 1980 regulations. Subsequent changes to, and interpretations of, these regulations by EPA indicates that Cosden's Part A Application is somewhat over-protective. In addition, due to the lack of representative test data, the application included all facilities within the Calumet City Plant where hazardous wastes or sludges might be accumulated or stored for more than 90 days. Since the time of that application, test data have been obtained on all wastes generated in the Plant. It has been determined that all the wastes which accumulate in the wastewater unit are non-hazardous.

Based on our interpretation of the regulations, as amended, we believe it is appropriate to request withdrawal of the Part A Application. Enclosed are Attachments I and II with information which amends, or explains, the information submitted in the Part A Application. I hope that this is sufficient information for your agency to make a favorable determination in this matter.

Additionally, we understand, that if withdrawal of the Part A Application is approved, that any facilities which have been used to store hazardous wastes (i.e., the Drum Storage Area) will be required to comply with closure procedures even though the same facility will continue to be used by the plant as a hazardous waste generator. We respectively request that your agency consider a waiver of these closure procedures since the closure plan for

the Drum Storage Area (Appendix C enclosed) consists of shipping all drummed wastes out for proper disposal and clean-up of the concrete slab. These procedures are routinely followed each 90 days or more frequently as necessary at the present time.

If you have any questions or require additional explanation, please contact me at the above address or telephone (915)263-7661.

Sincerely yours,

T. M. Nairn, Jr.

Ted M. Nairn, Jr.
Manager, Environmental Activities

TMN:VLD

Enc.

CC: Mr. Ron Medley, Vice President, Chemical Operations
Mr. Richard Grimes, Plant

ATTACHMENT I

The following information will amend the information submitted on page 1 of Form 3510-3.

Line 1; S01, 55 gallon: This represents Hazardous Wastes accumulated and stored in 55 gallon drums. These wastes may be shipped within each 90 day period.

Line 2; S02; 110,000 gallons: This represents the concrete reactor dump pit which is used only for emergencies. Section 265.198 (a)(3) would have been applicable for ignitable wastes. Test data was not available at the time of the application due to the infrequent use of this facility. Test data on these wastes have demonstrated that the wastes are non-hazardous. Therefore this facility should have been excluded from the Part A Application.

Line 3; S02, 80,000 gallons: This represents one of the concrete wastewater unit settling basins. Test data was not available at the time of the application. Test data on this waste has demonstrated that the sludge is non-hazardous, Therefore, this facility should have been excluded from the Part A Application. The proposed regulations (45 FR 76074), if finalized in their present form, would further exempt the wastewater unit if the sludge were hazardous.

Line 4; S02, 90,000 gallons: This represents another concrete wastewater unit settling basin operated in parallel with the one described in Line 3 above. The same comments apply.

Line 5; S02, 55,000 gallons: This represents the concrete equalization basin in the wastewater unit. This basin is downstream of those described in Line 3 and 4 above. The same comments apply as outlined for Line 3 above.

Line 6; S02, 43,000 gallons: This represents the concrete wastewater unit clarifier which is downstream of the equalization basin. The same comments apply as outlined for Line 3 above.

Line 7; S02, 16,000 gallons: This represents a steel storage tank designed to receive wastes from a spill of acrylonitrile in the plant. All acrylonitrile wastes have been placed directly in drums for disposal in the past. Acrylonitrile is not used in the plant at the present time. The May 19, 1980 regulations required that a tank which could not be completely emptied within each 90 days would require a storage permit. However, the interpretation issued by EPA on January 11, 1982 (47 FR 1250) states that "A tank will be considered empty when its' contents have been drained to the fullest extent possible." Therefore, this tank can be "emptied within each 90 day period if it is used.

TMN-11/30/82

ATTACHMENT II

This information will amend the information submitted on page 3 of Form 3510-3.

Line 1; U009, 60,000 pounds, S01: This represents an estimated amount of drummed wastes which might contain some amount of acrylonitrile. This material would be shipped within each 90 day period.

Lines 2 through 7: This represent potential laboratory waste solvents. These will be shipped within each 90 day period.

Lines 8 through 13: These represent contaminants which were suspected to be present in the wastewater unit sludges. Subsequent testing of the sludges has provided data to determine that the sludges are not hazardous. Please refer to the comments for Line 3 of Attachment I.

Line 14; U009, 35,000 pounds, S02: This represents an estimated volume of acrylonitrile spills and washdown water to clean up the spills. Please refer to the comments for Line 7 of Attachment I.

TMN/11-30-82

CALUMET CITY CLOSURE PLAN

DRUM STORAGE SITE A:

In the event of plant closure, this area will be void of any hazardous waste.

All drums will be properly labeled and shipped for disposal to a permitted off-site facility.

The concrete slab will be thoroughly cleaned with containments placed in DOT approved drums for shipment to an approved off-site facility.

The possibility of any ground water contamination adjacent to this area is remote as the slab is secured by a six inch concrete dyke with proper drainage to a sump contained within the storage area.

All water and contaminents would be processed through our waste treatment area.

FORM 1 GENERAL

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read "General Instructions" before starting.)

I. EPA I.D. NUMBER

F I L D 0 9 1 7 6 6 4 1 0 — D

LABEL ITEMS

I. EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all Items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X	
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	
J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP C O S D E N O I L & C H E M I C A L C O M P A N Y

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
2 R I C H A R D G R I M E S P L A N T M A N A G E R	3 1 2 — 8 6 2 — 6 1 4 0

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3 1 4 2 S T R E E T A N D P A X T O N A V E N U E

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 C A L U M E T C I T Y I L L I N O I S	I L	6 0 4 0 9

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 1 4 2 S T R E E T A N D P A X T O N A V E N U E

B. COUNTY NAME

C O O K C O U N T Y

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
6 C A L U M E T C I T Y	I L	6 0 4 0 9	0 3 1

4/15/85

EPA Form 3510-1 (6-80)

CONTINUE ON REVERSE

FORM 3510-3 RCRA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

olidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER: I I D0 9 1 7 6 6 4 1 0 | 1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

X 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

S | YR. 6 8 | MO. 1 1 | DAY 0 1

2. NEW FACILITY *(Complete item below.)*

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR. | MO. | DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

1. FACILITY HAS INTERIM STATUS

2. FACILITY HAS A RCRA PERMIT

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.

1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C | DUP | T/A | C | 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S 0 2	600	G	
X-2	T 0 3	20	E	
1	S 0 1	55	G	
2	S 0 2	~~110,000~~	G	
3	S 0 2	~~80,000~~	G	
4	S 0 2	~~90,000~~	G	
5	S 0 2	~~55,000~~	G	
6	S 0 2	~~43,000~~	G	
7	S 0 2	~~16,000~~	G	
8				
9	S 0 2	Total 394,000	G	
10				

NOV 20 1980

CONTINUE ON REVERSE

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY – For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

U.S. UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If you prefer to use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For *listed* hazardous waste: For each *listed* hazardous waste entered in column A *select the code(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. *(enter code)*	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE *(enter code)*	D. PROCESSES 1. PROCESS CODES *(enter)*	D. PROCESSES 2. PROCESS DESCRIPTION *(if a code is not entered in D(1))*
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				*included with above*

EPA I.D. NUMBER (enter from page 1)

W I L D 0 9 1 7 6 6 4 1 0

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W DUP 2 DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	U009	60,000	P	S01	
2	~~U002~~	~~0~~	P	S01	
3	~~U083~~	~~0~~	P	S01	
4	~~U154~~	~~0~~	P	S01	
5	~~U239~~	~~0~~	P	S01	
6	~~U220~~	~~0~~	P	S01	
7	D001	30,000	P	S01	
8	~~U009~~	UNKNOWN	P	S02	
9	~~D007~~	UNKNOWN	P	S02	
10	~~D008~~			S02	*Included with above
11	~~[illegible]~~			S02	*Included with above
12	~~[illegible]~~	UNKNOWN	P	S02	
13	~~[illegible]~~			S02	*Included with above
14	U009	35,000	P	S02	
15					
16					
17		See attachment A			
18					
19					
20					
21					
22					
23					
24					
25					
26					

EPA Form 3510-3 (6-80)

CONTINUE ON REVERSE

A. FIRST	B. SECOND
2821 (specify) See Attachment A	(specify)
C. THIRD	**D. FOURTH**
(specify)	(specify)

VIII. OPERATOR INFORMATION

A. NAME

COSDEN OIL & CHEMICAL COMPANY

B. Is the name listed in Item VIII-A also the owner? ☒ YES ☐ NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)

F = FEDERAL
S = STATE
P = PRIVATE
M = PUBLIC (other than federal or state)
O = OTHER (specify)

P (specify) Private

D. PHONE (area code & no.)

A 312 862 6140

E. STREET OR P.O. BOX

142 STREET & PAXTON AVENUE

F. CITY OR TOWN

CALUMET CITY

G. STATE IL

H. ZIP CODE 60409

IX. INDIAN LAND

Is the facility located on Indian lands? ☐ YES ☒ NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water) 9 N

D. PSD (Air Emissions from Proposed Sources) 9 P

B. UIC (Underground Injection of Fluids) 9 U

E. OTHER (specify) 9 2

(specify) See Attachment B

C. RCRA (Hazardous Wastes) 9 R

E. OTHER (specify) 9

(specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements. A/50

XII. NATURE OF BUSINESS (provide a brief description)

A/51

Production of polystyrene, SAN & ABS by Suspension process and High Impact polystyrene by Mass Polymerization process.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
Ronald D. Medley	Ronald D. Medley	11-17-80

COMMENTS FOR OFFICIAL USE ONLY

C

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3

EPA I.D. NO. (enter from page 1)

F ILD091766410 T/A C 16

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail). A/55

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail). A/56

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)	LONGITUDE (degrees, minutes, & seconds)
41 36 000	087 32 000

VIII. FACILITY OWNER

XX A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. (area code & no.)
E Cosden Oil and Chemical Company	312-862-6140

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F 142 St. and Paxton Avenue	G Calumet City	IL	60409

IX. OWNER CERTIFICATION

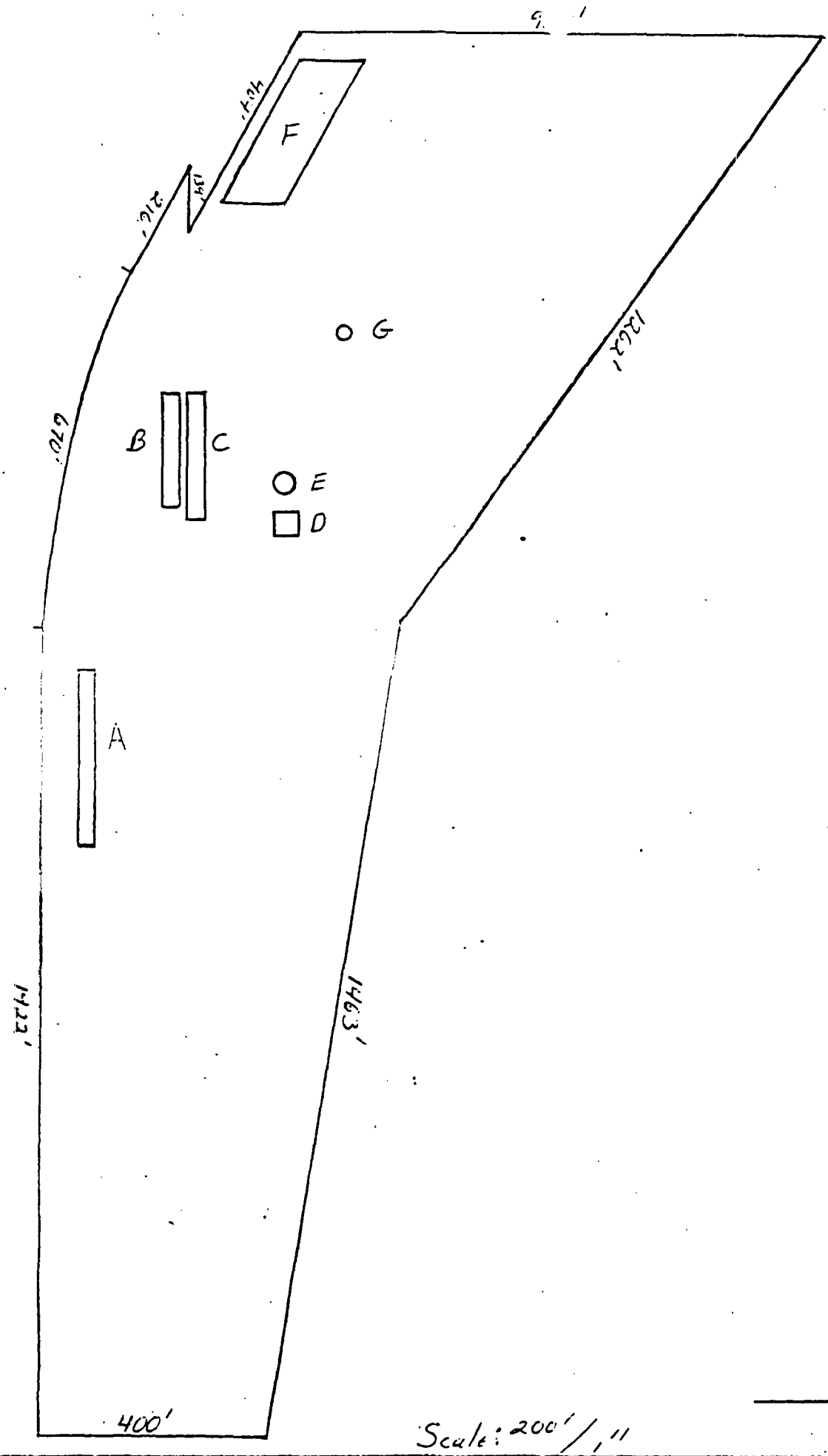
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
Ronald D. Medley	Ronald D. Medley	11-17-80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
Ronald D. Medley	Ronald D. Medley	11-17-80


F
G
B
C
E
D
A
670'
1263'
1463'
1423'
400'
N
Scale: 200'/1"

ATTACHMENT "A"

Cosden Oil and Chemical Company

Calumet City Facility

Item Number 8 thru Number 13 may contain hazardous waste. As samples become available, additional testing will be performed.

COSDEN OIL & CHEMICAL COMPANY
CHICAGO CHEMICAL PLANT
P. O. BOX 178
CALUMET CITY, ILLINOIS 60409

November 19, 1980

E. P. A. - Region V
RCRA Activities
P.O. Box 7861
Chicago, Illinois 60680

Gentlemen:

The topographic map required for Form I, Part XI has not been received as of this date. It will be forwarded to you upon its arrival.

Bill Lynch
Process Engineer
Cosden Oil & Chemical Co.

BL/dp

COSDEN OIL & CHEMICAL COMPANY

CALUMET CITY FACILITY

ATTACHMENT A

Product	SSC
Polystyrene	2821
Styrene	2821
SAN	2821
ABS	2821

ATTACHMENT B

COSDEN OIL AND CHEMICAL COMPANY

CALUMET CITY FACILITY

PERMIT SUMMARY

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

Permit #	Date	Description
04-040-143	10-24-74	Boiler and Generator Plant Equipment
04-040-144	10-30-74	Pellet Handling and Storage for Bulk Transfer
04-040-145	11-1-74	Extrusion and Pellet Transfer
04-040-146	10-30-74	Bead Handling and Storage
04-040-147	10-23-74	Reactors and Drying
09-040-017	2-8-80	Mass Impact Units (2)
80-030-025	5-15-80	ACN
09-020-029	3-19-79	Hot Oil Heater

METROPOLITAN SANITARY DISTRICT OF GREATER CHICAGO

Permit #	Date	Description
69-876	11-26-69	Permit for Sewage System

COSDEN OIL & CHEMICAL COMPANY
CHICAGO CHEMICAL PLANT
P. O. BOX 178
CALUMET CITY, ILLINOIS 60409

ILD091766410

December 17, 1980

E.P.A. Region V
RCRA Activities
P.O. Box 7861
Chicago, Illinois 60680

Gentlemen:

Enclosed is the topographic map needed to complete Form 1 - "General Information". Will you please include it with the rest of the submitted information.

Thank you,

BILL LYNCH
Process Engineer

BL/dp

DEC 16 1980